



February 26, 2025

E-Filed

The Honorable Vince Chhabria
450 Golden Gate Avenue
17th Floor, Courtroom 4
San Francisco, CA 94102

Re: *Kadrey, et al v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC
Response to Dkt. 455 – Enclosure of Documents

Dear Judge Chhabria,

We write on behalf of Defendant Meta Platforms (“Meta”) further to the Court’s February 25, 2025 Order (Dkt. 455) “encouraging Meta to revisit” nine documents previously submitted for *in camera* review “to consider whether all of the material withheld and redacted from” those documents is truly privileged. *Id.*

In response to that Order, Meta has undertaken a careful review of each of those documents and the redactions therein. Meta in good faith attempted to make appropriate assertions of privilege in the first instance and avoid waiver, and as the Court will appreciate, there were close judgment calls. Given the Court’s guidance and Order, Meta has removed certain redactions from four of the documents (two of which (Documents 32-33) are substantively identical): 1, 32-33, and 59. Each of these documents now contains fewer redactions. For the remaining five documents, Meta believes that they were properly withheld in full or redacted to protect privilege, and we would be happy to answer any questions the Court may have about them.

Before the hearing tomorrow morning, Meta will provide the Court with a flash drive with these four documents, indicating with red outlining the portions for which it has removed redactions. Meta will also produce revised versions of those documents to Plaintiffs.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Bobby Ghajar
/s/ Kathleen Hartnett
Bobby A. Ghajar
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